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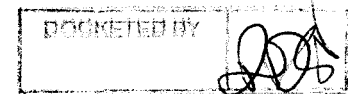
AZ CORP COMMISSION
DOCKET CONTROL

July 29, 2011

Mr. Steve Olea
Director – Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Arizona Corporation Commission
DOCKETED

JUL 29 2011



RE: DOCKET NO. T-00000A-97-0238
QWEST CORPORATION'S STATUS REPORT REGARDING
IMPLEMENTATION OF RECOMMENDATIONS IN OSS ORDER
SUBMITTED TO ARIZONA CORPORATION COMMISSION UTILITIES
COMPLIANCE DIVISION

Dear Steve,

Qwest Corporation ("Qwest" or "Company") submits the attached Final Status Report regarding implementation of certain limited and specified recommendations ordered by the Arizona Corporation Commission ("Commission"), regarding Qwest's Operational Support Systems ("OSS").

The ordering clause appearing on lines 7-9 on page 50 of the OSS Order¹ directed Qwest to provide the Commission with quarterly status reports on its progress in implementing the recommendations contained in paragraphs 145-151 of the Order.² This letter concerns only the OSS Recommendations Status Report. A copy of the most recent OSS Recommendations Status Report is attached to this letter, to assist the Staff in identifying the filings to which this letter refers. On January 31, 2005, Qwest's report indicated that it had completed implementation for all of the OSS activities required by the OSS Order. At that time, in light of the completion of the actions required by the OSS Order, Qwest stated in its report that, "going forward, this report will not be filed in Docket No. T-00000A-97-0238, but will be sent to the ACC's Compliance

¹ Order, *In the Matter of U.S. WEST Communications, Inc.'s Compliance with Section 271 of the Telecommunications Act of 1996*, ACC Docket No. T-00000A-97-0238, Decision No. 66224 (August 28, 2003).

² With respect to the quarterly report regarding the Change Management Process ("CMP") required by paragraph 151, Qwest has submitted separate reports each quarter. The remaining reports required by the other paragraphs have been the subject of a quarterly report captioned "Qwest Corporation's Status Report Regarding Implementation of Recommendation in OSS Order," which is referred to through the rest of this letter as the "OSS Recommendations Status Report."

Division." Notwithstanding that statement, Qwest continued to file an OSS Recommendations Status Report in the docket every quarter, the last filing having been made on April 29, 2011. Each of these subsequent quarterly reports simply restated the fact that Qwest had completed all implementation activities required by the OSS Order.

Over 6 years have now elapsed since Qwest first reported that it had completed implementation of the specific recommendations and requirements of the OSS Order, and since Qwest stated that it would stop filing its reports in the Docket. No CLEC has objected to Qwest's statements that it has completed the implementation items or objected to Qwest's statement that it intended to stop filing the reports in the Docket. Further, nothing has changed with respect to these matters which Qwest implemented. It seems reasonable to conclude that the ordering paragraph requiring quarterly reporting of these one time OSS implementation activities was meant to last only until such time as those activities had been concluded, since ongoing reporting of a completed activity provides no useful information to the Staff or any other party, nor serves any other useful purpose. For these reasons, it is clear that the OSS Recommendations Status Report should be discontinued. Qwest therefore seeks the Staff's concurrence that Qwest has completed its reporting obligation with regard to the OSS Recommendations Status Report. A copy of this letter is being filed with Docket Control and is being sent to each remaining party on the service list for Docket No. T-00000A-97-0238.

Please let me know if you have any questions or wish to discuss.

Sincerely,



Attachment

cc: Docket Control
Brian Bozzo

ORIGINAL

BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

GARY PIERCE
Chairman
PAUL NEWMAN
Commissioner
SANDRA D. KENNEDY
Commissioner
BOB STUMP
Commissioner
BRENDA BURNS
Commissioner

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Arizona Corporation Commission

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APR 29 2011

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DOCKETED BY

[Signature]

DOCKET NO. T-00000A-97-0238

IN THE MATTER OF QWEST
CORPORATION'S COMPLIANCE WITH
§271 OF THE TELECOMMUNICATIONS
ACT OF 1996

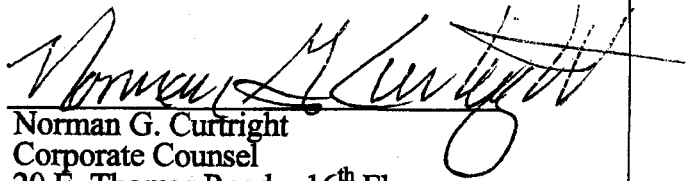
QWEST'S REPORT FOR THE FIRST
QUARTER 2011 ON RESOLD LINE
SPLITTING AND EEL SPLITTING
PURSUANT TO COMMISSION
ORDER

In the Arizona Corporation Commission's ("Commission") NID and Line Splitting Decision, the Commission ordered Qwest to revise SGAT §9.24.1.1 to include a provision that "Qwest shall report the level of region-wide demand by state for resold line splitting and EEL line splitting on a quarterly basis to the Commission staff and interested CLECs." See Decision No. 64880, page 6, 29. In compliance with this Order, Qwest included the SGAT language in its May 31, 2002 SGAT filing. Qwest now files a report for the First Quarter of 2011.

Through the First Quarter of 2011, Qwest had zero resold line splitting arrangements in the Qwest 14-state region. Through the First Quarter of 2011, Qwest does not have any installations or requests to install EEL splitting anywhere in its 14-state region.

1 RESPECTFULLY SUBMITTED this 29th day of April, 2011.

2
3 QWEST CORPORATION

4
5 By: 
6 Norman G. Curtright
7 Corporate Counsel
8 20 E. Thomas Road – 16th Floor
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 Telephone: (602) 630-2187

9 **ORIGINAL and 13 copies hand-delivered for**
10 **Filing this 29th day of April, 2011 to:**

11 Docket Control
12 ARIZONA CORPORATION COMMISSION
13 1200 W. Washington Street
14 Phoenix, AZ 85007

15 **COPY of the foregoing mailed**
16 **this this 29th day of April, 2011 to:**

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21 Phoenix, AZ 95007

22 Terri Ford
23 ARIZONA CORPORATION COMMISSION
24 1200 W. Washington Street
25 Phoenix, AZ 85007

26 Steve Olea, Director
 Utilities Division
 ARIZONA CORPORATION COMMISSION
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 Thomas F. Dixon
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2 Jane Rodda, Administrative Law Judge
3 Hearing Division
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BEFORE THE ARIZONA CORPORATION COMMISSION
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GARY PIERCE
Chairman
PAUL NEWMAN
Commissioner
SANDRA D. KENNEDY
Commissioner
BOB STUMP
Commissioner
BRENDA BURNS
Commissioner

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ARIZONA CORPORATION COMMISSION
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Arizona Corporation Commission

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APR 29 2011

DOCKETED BY

QOR

DOCKET NO. T-00000A-97-0238

IN THE MATTER OF QWEST
CORPORATION'S COMPLIANCE WITH
§271 OF THE TELECOMMUNICATIONS
ACT OF 1996

QWEST CORPORATION'S STATUS
REPORT REGARDING
IMPLEMENTATION OF
RECOMMENDATION IN OSS ORDER

Qwest Corporation ("Qwest") respectfully submits this status report ("Report") regarding its implementation of the recommendations in the Arizona Corporation Commission's ("the Commission" or "ACC") Order regarding Qwest's Operational Support Systems ("OSS").¹

In the OSS Order, the Commission directed Qwest to provide the Commission with quarterly status reports on its progress in implementing the recommendations contained in paragraphs 145-151² of the Order. Qwest has met all the requirements contained in Decision No. 66224 dated August 28, 2003.

¹ Order, *In the Matter of U.S. WEST Communications, Inc.'s Compliance with Section 271 of the Telecommunications Act of 1996*, ACC Docket No. T-00000A-97-0238, Decision No. 66224 (August 28, 2003).

² Order at 150. Although paragraph 150 was included in the list of paragraphs the Commission ordered Qwest to immediately begin implementing, that paragraph does not contain recommendations. Instead, it states as follows: "Staff supports the findings and conclusions reached by its Test Administrator, CGE&Y, in its Qwest CMP Re-

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3 RESPECTFULLY SUBMITTED this 29th day of April, 2011.
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5 QWEST CORPORATION

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9 Corporate Counsel
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12 Telephone: (602) 630-2187

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Design Evaluation dated March 25, 2002, and recommends that the Commission adopt it."

1 Lyn Farmer, Chief Administrative Law Judge
2 Jane Rodda, Administrative Law Judge
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